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7 Counsel to Debtors

8 Alan Gomperts, Daniel Halevy, and

9 Susan Halevy

10 **UNITED STATES BANKRUPTCY COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

12 In re:

13 SEATON INVESTMENTS, LLC, *et al.*, -- *Now a*
dismissed case

14 Debtors and Debtors in
15 Possession.

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ
and 2:24-bk-12076-VZ

Chapter 11

17 **STIPULATION TO FURTHER
CONTINUE HEARING ON
MOTION TO AUTHORIZE USE OF
CASH COLLATERAL PURSUANT
TO 11 U.S.C. § 363(c)(2)**

18 Current Hearing:

Date: April 1, 2025

Time: 11:00 a.m.

Crtrm.: 1368

19 Proposed Continued Hearing:

Date: May 6, 2025

Time: 11:00 a.m.

Crtrm: 1368

- 20 ☐ Affects All Debtors.
21 ☐ Affects Seaton Investments, LLC (*Dismissed*)
22 ☐ Affects Colyton Investments, LLC (*Dismissed*)
23 ☐ Affects Broadway Avenue Investments, LLC
24 ☒ Affects SLA Investments, LLC
25 ☒ Affects Negev Investments, LLC
26 ☒ Affects Alan Gomperts
27 ☐ Affects Daniel Halevy
28 ☒ Affects Susan Halevy

SLA Investments, LLC (“SLA”), Negev Investments, LLC (“Negev”), Susan Halevy (“Susan” or “Susan Halevy”), and Alan Gomperts (“Alan” or “Alan Gomperts”), debtors and debtors-in-possession (the “Debtors”), Archway Broadway Loan SPE, LLC, successor-in-interest to Archway Real Estate Income I REIT, LLC fka Archway Real Estate Income Fund I SPE I, LLC (“Archway”), Wells Fargo Bank National West (“Wells Fargo”) as to the 2220 Bagley Ave and 3538 Greenfield Properties, and Harvest Small Business Finance, LLC (“Harvest”) (Archway, Wells Fargo and Harvest, collectively, the “Lenders”)— in the above-entitled jointly administered chapter 11 bankruptcy cases (the “Bankruptcy Cases”) hereby stipulate as follows:

RECITALS

1. On March 18 and 19, 2024 the Debtors filed their jointly administered voluntary chapter 11 cases.
2. On June 7, 2024 the Debtors filed their *Motion By Affected Debtors For Entry Of An Order Authorizing Use Of Cash Collateral Pursuant To 11 U.S.C. § 363(c)(2)* (“Motion”) (Docket No. 87).
3. The initial hearing on the Motion was held on June 20, 2024 on shortened time.
4. A continued hearing was scheduled for July 23, 2024, at 11:00 a.m.
5. On June 17, 2024, Wells Fargo filed Oppositions to Debtor’s Motion with respect to the 2220 Bagley and 3538 Greenfield Properties. *See* Docket Nos. 100 and 101.
6. On June 17, 2024, Archway filed an *Objection by Archway Real Estate Income Fund I SPE I, LLC to Motion by Affected Debtors for Entry of an Order Authorizing Use of Cash Collateral Pursuant to 11 U.S.C. § 363(c)(2)* (“Archway Objection”) (Docket No. 99).
7. On June 18, 2024, Archway filed a *Status Report re Objection by Archway Real Estate Income Fund I SPE I, LLC to Motion by Affected Debtors for Entry of an Order Authorizing Use of Cash Collateral Pursuant to 11 U.S.C. § 363(c)(2)* (“Status Report”) (Docket No. 104). In the Status Report, Archway consented to limited use of cash collateral on an interim basis under certain conditions set forth therein, including that Archway’s rights and remedies with respect to the Archway Objection be reserved and preserved and that it be granted certain adequate protection,

1 including a replacement lien and restrictions on the use of cash collateral, as set forth therein
2 (collectively, “Archway Rights and Protections”).

3 8. On July 18, 2024, the Court entered its order authorizing the Debtors’ interim use of
4 cash collateral through July 23, 2024 (Docket No. 127) (the “Interim Cash Collateral Order”). The
5 Interim Cash Collateral Order sets forth, preserves, and reaffirms certain rights and adequate
6 protection measures in favor of the Lenders, including the Archway Rights and Protections
7 (collectively, the “Lender Rights and Protections”).

8 9. A continued hearing on interim use of cash collateral was scheduled for July 23,
9 2024.

10 10. On July 22, 2024, the Debtors and Lenders submitted a stipulation to continue the
11 hearing interim use of cash collateral and extend authorization for use of cash collateral by
12 approximately one month to August 27, 2024 (Docket No. 131).

13 11. On July 23, 2024, the Court entered its order approving the stipulation, thereby
14 authorizing the use of cash collateral and continuing the hearing to August 27, 2024.

15 12. On August 26, 2024, the Debtors and Lenders submitted a stipulation to further
16 continue the hearing on interim use of cash collateral and to extend authorization for use of cash
17 collateral to October 8, 2024 (Docket No. 174).

18 13. On August 26, 2024, the Court entered its order approving the stipulation, which
19 authorized cash collateral use and continued the hearing to October 8, 2024 (Docket No. 176).

20 14. On October 3, 2024, the Debtors and Lenders submitted a further stipulation to
21 continue the hearing on interim use of cash collateral and to extend authorization for use of cash
22 collateral to November 12, 2024 at 11:00 a.m. (Docket No. 210).

23 15. On October 9, 2024, the Court entered its order approving the stipulation, which
24 authorized cash collateral use and continued the hearing to November 12, 2024 (Docket No. 215).

25 16. On November 8, 2024, the Debtors and Lenders submitted a further stipulation to
26 continue the hearing on interim use of cash collateral and to extend authorization for use of cash
27 collateral to December 10, 2024 at 11:00 a.m. (Docket No. 288).

28 17. On November 12, 2024, the Court entered its order approving the stipulation, which

1 authorized cash collateral use and continued the hearing to December 10, 2024 (Docket No. 290).

2 18. On December 4, 2024, Alan Gomperts and Wells Fargo submitted two stipulations
3 authorizing the use of cash collateral as to the 2220 Bagley Ave and 3538 Greenfield Properties
4 (together, the “Wells Fargo Stipulations,” Docket Nos. 335, 338).

5 19. On December 10, 2024, the Court rescheduled/continued the hearing on the continued
6 use of cash collateral to February 25, 2025 at 11:00 a.m.

7 20. On December 20, 2024, the Court entered orders approving the Wells Fargo
8 Stipulations, but the Court only approved the continued use of cash collateral on an interim basis
9 through the date of the continued hearing on February 25, 2025 (Docket Nos. 365, 366).

10 21. On February 24, 2025, the Court entered an order approving the Lenders and
11 Debtors’ stipulation to further continue the use of cash collateral, continuing the hearing from
12 February 25, 2025 at 11:00 a.m. to April 1, 2025 at 11:00 a.m. (Docket No. 449).

13 22. The Lenders and the Debtors discussed and agreed to further extend cash collateral
14 use, subject to adequate protection in the form of, without limitation, the Lender Rights and
15 Protections.

16 23. Accordingly the Lenders and the Debtors enter into this stipulation.

17 **STIPULATION**

18 24. The foregoing recitals are incorporated herein.

19 25. The Lenders and the Debtors stipulate and agree that the hearing on the Motion
20 should be further continued from April 1, 2025 at 11:00 a.m. to May 6, 2025 at 11:00 a.m. (based on
21 the Court’s “Available Self-Calendaring Dates”), or to another date convenient to the Court that is
22 one month after April 1, 2025.

23 26. The Lenders and the Debtors stipulate and agree that the Debtors’ authorization to
24 use cash collateral should be extended through the same date as the further continued hearing,
25 subject to the Lender Rights and Protections.

26 27. Wells Fargo and debtor Alan Gomperts stipulate and agree to authorization to use
27 cash collateral subject to the same terms and conditions in the Wells Fargo Stipulations, which
28 shall be incorporated herein, through the date of the further continued hearing.

1 28. The Lenders and the Debtors stipulate and agree that all the terms of the Interim
2 Cash Collateral Order, including the Lender Rights and Protections, shall remain in full force and
3 effect and unchanged except for the extension of the period of authorization to use cash collateral
4 and the continuance of the hearing date on the Motion.

5 **IT IS SO STIPULATED.**

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8 Dated: April 25, 2025

SAUL EWING LLP

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10 

11 By: _____

Zev Shechtman

Ryan Coy

12 Attorneys for debtors Susan Halevy and Alan Gomperts
13

14 Dated: April 3, 2025

**WEINTRAUB ZOLKIN TALERICO & SELTH
LLP**

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16 

17 By: _____

18 Derrick Talerico, Attorneys for debtors SLA and Negev
19

20 [Signatures Continued on Next Page]
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1 **IT IS SO STIPULATED.**

2 Dated: April 4, 2025

FRANDZEL ROBINS BLOOM & CSATO, L.C.

4 By: 

5 Gerrick M. Warrington, attorneys for ARCHWAY
6 BROADWAY LOAN SPE, LLC

7 Dated: April __, 2025

HEMAR, ROUSSO & HEALD, LLP

9 By: _____

10 Christopher Crowell, attorneys for HARVEST
11 SMALL BUSINESS FINANCE, LLC

12 Dated: April 25, 2025

ALDRIDGE PITE, LLP

13 By: 

14 Todd S. Garan, attorneys for WELLS FARGO
15 BANK NATIONAL WEST
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1 **IT IS SO STIPULATED.**

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Dated: April __, 2025

FRANDZEL ROBINS BLOOM & CSATO, L.C.

4

By: _____

5

Gerrick M. Warrington, attorneys for ARCHWAY
BROADWAY LOAN SPE, LLC

6

7

Dated: April 3, 2025

HEMAR, ROUSSO & HEALD, LLP

8

By:  _____

9

Christopher Crowell, attorneys for HARVEST
SMALL BUSINESS FINANCE, LLC

10

11

Dated: April __, 2025

ALDRIDGE PITE, LLP

12

13

By: _____

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Todd S. Garan, attorneys for WELLS FARGO
BANK NATIONAL WEST

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
Saul Ewing LLP, 1888 Century Park East, Suite 1500, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **Stipulation to Further Continue Hearing on Motion to Authorize Use of Cash Collateral Pursuant to 11 U.S.C. § 363(c)(2)** be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **April 25, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 25, 2025
Date

Hannah Richmond
Printed Name

/s/ Hannah Richmond
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF) (continued):

- **Scott R Albrecht** salbrecht@gsaattorneys.com, jackie.nguyen@sgsattorneys.com
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- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
- **Garrick Vanderfin** gvanderfin@polsinelli.com, zyoung@Polsinelli.com;ladoocketing@polsinelli.com
- **Gerrick Warrington** gwarrington@frandzel.com, achase@frandzel.com
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